

- Page 4 -

reserve hereby the right to answer said Paragraph if and when it is presented to them or to your Honorable Court upon reasonable notice given to your Respondents.

SEVENTH: That in answer to Paragraph 7 of said Bill of Complaint, your Respondents admit that Exhibit G purports to show Lot 85 improved by a structure which is situated in part on said Lot 85, in part in the bed of Federal Street, and in part in the bed of North Alley; however, your Respondents neither admit nor deny that the building is so situated since they have no actual knowledge of the road boundaries in relation to the building site.

EIGHTH: That in further answer to said paragraph 7 of said Bill of Complaint, your Respondents neither admit nor deny that the structure was constructed by predecessors of the Board since they do not know technically who constructed it, it having been the belief of your Respondents that agents of the Board had constructed the building, at the expense of the Board, this belief being based on copies of the minutes of the meetings of the said Board which minutes are dated for meetings on Friday, August 18, 1939 and on Wednesday, September 6, 1939.

NINTH: That in further answer to said paragraph 7 of said Bill of Complaint, your Respondents deny that Exhibit G shows "The portion of the bed of Federal Street so occupied (by the building) being a strip approximately 20 feet deep by 60 feet long and the portion of the bed or (sic) (of) North Alley being approximately 5 feet deep by 22 feet long," since the exhibit does not show either the building size nor the amount of "encroachment."

TENTH: That in further answer to said Paragraph 7 of said Bill of Complaint, your Respondents neither admit nor deny that following "their acquisition of Lot 85 (Exhibit F), the Armstrongs expended substantial sums in the restoration and improvement of said structure and in the development of Lot 84 and 85 so as to develop a high quality antique shop and so as to create a total facility having historic architectural and educational significance. The total facility is now operated by the Armstrongs under the trade name of